

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

DISABILITY RIGHTS RHODE )  
ISLAND, )  
 )  
Plaintiff )  
 )  
v. )  
 )  
RICHARD CHAREST, in his official )  
capacity as Director of )  
THE RHODE ISLAND )  
DEPARTMENT OF )  
BEHAVIORAL HEALTHCARE, )  
DEVELOPMENTAL DISABILITIES & )  
HOSPITALS, )  
 )  
Defendant. )  
 )

C.A. No. 1:22-cv-00304-MSM-PAS

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**PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Fed. R. Civ. P. 65, Plaintiff Disability Rights Rhode Island seeks to enjoin Defendant Charest from restricting its statutorily-mandated authority to obtain access to the individual records of a patient at Eleanor Slater Hospital, which Defendant operates in his official capacity as Director of the Rhode Island Department of Behavioral Healthcare, Developmental Disabilities & Hospitals. Plaintiff requests that this Court issue a preliminary injunction, requiring Defendant to permit Plaintiff to have access to records of the Hospital restraint committee and Hospital restraint reduction committee related to patient S.R., to the full extent permitted by federal and state law. Plaintiff further requests that the Court waive the bond required to secure a preliminary injunction.

Plaintiff's Memorandum in Support of this Motion is attached. Based on this Memorandum, and pursuant to LR Cv 7(c), Plaintiff does not request oral argument on the Motion.

This 25th day of August, 2022.

Respectfully submitted,

/s/ Brian Adae

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/s/ Kristine L. Sullivan

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CERTIFICATE OF SERVICE

I hereby certify that on August 25, 2022, the foregoing PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION was filed with the United States District Court for the District of Rhode Island using the CM/ECF system and sent by e-mail to the following recipients.

/s/ Kristine L. Sullivan

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